



BRAND PERFORMANCE CHECK

Bel-confect NV

PUBLICATION DATE: MARCH 2020

this report covers the evaluation period 01-07-2018 to 30-06-2019

ABOUT THE BRAND PERFORMANCE CHECK

Fair Wear Foundation believes that improving conditions for apparel product location workers requires change at many levels. Traditional efforts to improve conditions focus primarily on the product location. FWF, however, believes that the management decisions of clothing brands have an enormous influence for good or ill on product location conditions.

FWF's Brand Performance Check is a tool to evaluate and report on the activities of FWF's member companies. The Checks examine how member company management systems support FWF's Code of Labour Practices. They evaluate the parts of member company supply chains where clothing is assembled. This is the most labour intensive part of garment supply chains, and where brands can have the most influence over working conditions.

In most apparel supply chains, clothing brands do not own product locations, and most product locations work for many different brands. This means that in most cases FWF member companies have influence, but not direct control, over working conditions. As a result, the Brand Performance Checks focus primarily on verifying the efforts of member companies. Outcomes at the product location level are assessed via audits and complaint reports, however the complexity of the supply chains means that even the best efforts of FWF member companies cannot guarantee results.

Even if outcomes at the product location level cannot be guaranteed, the importance of good management practices by member companies cannot be understated. Even one concerned customer at a product location can have significant positive impacts on a range of issues like health and safety conditions or freedom of association. And if one customer at a product location can demonstrate that improvements are possible, other customers no longer have an excuse not to act. The development and sharing of these types of best practices has long been a core part of FWF's work.

The Brand Performance Check system is designed to accommodate the range of structures and strengths that different companies have, and reflects the different ways that brands can support better working conditions.

This report is based on interviews with member company employees who play important roles in the management of supply chains, and a variety of documentation sources, financial records, supplier data. The findings from the Brand Performance Check are summarized and published at www.fairwear.org. The online [Brand Performance Check Guide](#) provides more information about the indicators.

BRAND PERFORMANCE CHECK OVERVIEW

Bel-confect NV

Evaluation Period: 01-07-2018 to 30-06-2019

MEMBER COMPANY INFORMATION	
Headquarters:	Dottenijs, Belgium
Member since:	01-06-2016
Product types:	Workwear
Production in countries where FWF is active:	Bangladesh, China, Romania, Tunisia, Turkey
Production in other countries:	Albania, Hungary, Pakistan, Portugal
BASIC REQUIREMENTS	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
SCORING OVERVIEW	
% of own production under monitoring	83%
Benchmarking score	71
Category	Good 71

Summary:

Bel-Confect has shown progress and met most of FWF's performance requirements. Bel-Confect's monitoring threshold is 83% of its supply chain, meeting the threshold for third-year members. With a benchmark score of 71, Fair Wear is placing Bel-Confect in the Good category.

Bel-Confect's tail end -number of production locations with small leverage- slightly grow compared to the year before, probably due to new projects. Bel-Confect has invested in good monitoring systems and this supports them in keeping track of the social compliance status at its production locations. Its due diligence process, sharing of audit results and factory visits are well documented. Bel-Confect's due diligence process is comprehensive and could be a resource document for the development of a sourcing strategy.

Bel-Confect supported one production location with the remediation of health and safety issues. A positive first step forward was made on the living wage topic, the labour minute costs of one production location in Tunisia were analysed. Bel-Confect has invested in one Workplace Education Programme training in Tunisia. Bel-Confect is encouraged to enrol more production locations in training programmes to country/factory specific topics.

Fair Wear recommends Bel-Confect to use Fair Wear audit teams in combination with its own auditing system.

PERFORMANCE CATEGORY OVERVIEW

Leader: This category is for member companies who are doing exceptionally well, and are operating at an advanced level. Leaders show best practices in complex areas such as living wages and freedom of association.

Good: It is FWF's belief that member companies who are making a serious effort to implement the Code of Labour Practices—the vast majority of FWF member companies—are 'doing good' and deserve to be recognized as such. They are also doing more than the average clothing company, and have allowed their internal processes to be examined and publicly reported on by an independent NGO. The majority of member companies will receive a 'Good' rating.

Needs Improvement: Member companies are most likely to find themselves in this category when major unexpected problems have arisen, or if they are unable or unwilling to seriously work towards CoLP implementation. Member companies may be in this category for one year only after which they should either move up to Good, or will be moved to suspended.

Suspended: Member companies who either fail to meet one of the Basic Requirements, have had major internal changes which means membership must be put on hold for a maximum of one year, or have been in Needs Improvement for more than one year. Member companies may remain in this category for one year maximum, after which termination proceedings will come into force.

Categories are calculated based on a combination of benchmarking score and the percentage of own production under monitoring. The specific requirements for each category are outlined in the Brand Performance Check Guide.

1. PURCHASING PRACTICES

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.1a Percentage of production volume from production locations where member company buys at least 10% of production capacity.	76%	Member companies with less than 10% of a production location's production capacity generally have limited influence on production location managers to make changes.	Supplier information provided by member company.	4	4	0

Comment: Bel-Confect has nine active production locations, and sources in Bangladesh, China, Romania, Tunisia, Turkey, Albania, Hungary, Pakistan and Portugal.

Bel-Confect's key production locations are in Tunisia, the owners of Bel-Confect are also owners of a distribution centre (DC) in Tunisia. Approximately 60% of its FOB is produced here. The staff of this DC is in daily contact with factories concerning planning, quality, follow-up on CAPs. Based on good CSR performance, orders grow at these production locations.

Bel-Confect has good relationships with two suppliers in Turkey for its bio textiles and one has shown improvements related to CSR.

Small suppliers located in Bangladesh and Pakistan will gradually be faced out due to CSR, late delivery and distance reasons. Bel-Confect will grow at suppliers they easily could visit.

Recommendation: FWF recommends Bel-Confect to consolidate its supplier base where possible, especially considering the relationship with suppliers located in relatively new production countries. It is advised to describe the process of consolidation in a sourcing strategy that is agreed upon with top management/sourcing staff, which includes a responsible exit strategy.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.1b Percentage of production volume from production locations where member company buys less than 2% of its total FOB.	6%	FWF provides incentives to clothing brands to consolidate their supplier base, especially at the tail end, as much as possible, and rewards those members who have a small tail end. Shortening the tail end reduces social compliance risks and enhances the impact of efficient use of capital and remediation efforts.	Production location information as provided to FWF.	3	4	0

Comment: In the past financial year, Bel-Confect bought 6% of its production volume from production locations where it buys less than 2% of its total FOB (compared to 3% last year). Bel-Confect's production is project-based if a new project comes in factory production can grow quickly.

Recommendation: FWF recommends Bel-Confect to consolidate its supply base by limiting the number of production locations in its 'tail end'. To achieve this, members should determine whether production locations where they buy less than 2% of their FOB are of strategic relevance. Shortening the tail will reduce the social compliance risks the member is exposed to and will allow the member to improve working conditions in a more efficient and effective way.

It is advised to describe the process of consolidation in a sourcing strategy that is agreed upon with top management/sourcing staff.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.2 Percentage of production volume from production locations where a business relationship has existed for at least five years.	64%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	3	4	0

Comment: Bel-Confect aims to have long term business relations. With 64% of production locations, there is an existing business relation for at least five years.

Recommendation: FWF recommends Bel-Confect to maintain stable business relationships with suppliers. Long term relationships support most aspects of the Code of Labour Practices, and give factories a reason to invest in improving working conditions. It is advised to describe policies regarding maintaining long term business relationship in a sourcing strategy that is agreed upon with top management/sourcing staff.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.3 All (new) production locations are required to sign and return the questionnaire with the Code of Labour Practices before first bulk orders are placed.	Yes	The CoLP is the foundation of all work between production locations and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.	2	2	0

Comment: As part of their due diligence, Bel-Confect requires a signed and returned questionnaire from (new) production locations before placing orders. Bel-Confect could show questionnaires were on file, except for two factories that are also producing for other Fair Wear members.

Requirement: Bel-Confect should ask the factory/Fair Wear member to forward the signed questionnaire, to make sure recent factory details are stored in Bel-Confect's documentation.

Recommendation: It is advised to use the outcome of the questionnaires to update the production location data, for instance on leverage and subcontractor information. Moreover, members are also encouraged to follow up with suppliers in case they do not endorse the Code of Labour Practices or show resistance in some of the replies.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.4 Member company conducts human rights due diligence at all (new) production locations before placing orders.	Advanced	Due diligence helps to identify, prevent and mitigate potential human rights problems at suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	4	4	0

Comment: Bel-Confect works with a due diligence procedure for (new) production locations. In a first e-mail the FWF membership of Bel-Confect is explained and an existing audit report is requested and analyzed. It has developed guidelines for the assessment of audits and analyzed the quality of the audit with the FWF Audit Quality Assessment Tool.

During the sampling process, suppliers have to return the signed questionnaire and a photo of the CoLP in the facility. When the production manager visits the locations she also takes photos of the posted Worker Information Sheets. The CSR advisor files the documents and photos. Orders can only be placed after permission of the CSR advisor.

With new suppliers, Bel-Confect discusses country-specific risks, based on Fair Wear country studies. The production manager discusses labour issues during factory visits. For Turkey a special letter referring to Fair Wear's policy about employing Syrian refugee workers in Turkey. Bel-Confect could show that a harassment issue has been discussed with factory management and workers.

The due diligence process is clearly defined and could be integrated into a sourcing strategy.

Recommendation: It is advised to describe the process of assessing working conditions at potential new suppliers in a sourcing strategy that is agreed upon with top management/sourcing staff.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.5 Production location compliance with Code of Labour Practices is evaluated in a systematic manner.	Yes, and leads to production decisions	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	2	2	0

Comment: Bel-Confect evaluates the social compliance of its suppliers systematically, based on a signed questionnaire, factory visits, social audits and CAP follow up. Bel-Confect could show that one factory in Tunisia got more orders due to improved social compliance.

Recommendation: Bel-confect is encouraged to integrate a scoring (weighting) to the different social compliance elements in the evaluation system.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.6 The member company's production planning systems support reasonable working hours.	General or ad-hoc system.	Member company production planning systems can have a significant impact on the levels of excessive overtime at production locations.	Documentation of robust planning systems.	2	4	0

Comment: Bel-Confect produces 80% custom-made for clients, often based on longer-term contracts for a stable client base. It also has 20% production of Never Out of Stock (NOS) items.

For the custom-made production, Bel-Confect has a production scheme with defined steps for risk analysis of the fabric, dyeing, design, production etc. After each step (duration is 3-4 weeks), Bel-Confect has a check-in moment with its clients for each step to confirm the status of the product. By this way clients are involved in every stage of the production process, delays are communicated at an early stage, and in this way also the pressure on suppliers.

With regard to the NOS items planning, Bel-Confect has an annual forecast which is shared with the suppliers, which are consulted beforehand. Bel-Confect is well aware of the production capacity of its Tunisian suppliers. Country specific holidays, like local holidays and Ramadan, are taken into account.

Bel-Confect has guidelines for production planning and setting lead times, the guidelines include specifics per country, per fabric type, per supplier. Before setting lead times Bel-Confect consults the supplier in advance for instance about the available production capacity/production lines. In case a client indicates a fast delivery, Bel-Confect discusses this with suppliers or has three Tunisian facilities where they place the order in case possible.

Recommendation: FWF recommends Bel-Confect to learn more about the standard minute per style and how the production of its products impacts the total production capacity of the factory. And FWF recommends Bel-Confect to discuss with the factories how to deal with the planning of production during peak season to prevent excessive overtime.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.7 Degree to which member company mitigates root causes of excessive overtime.	Intermediate efforts	Some production delays are outside of the control of member companies; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime.	Evidence of how member responds to excessive overtime and strategies that help reduce the risk of excessive overtime, such as: root cause analysis, reports, correspondence with factories, etc.	3	6	0

Comment: When excessive overtime is discovered in an audit, Bel-Confect responds through discussing the results of the audit and discussing follow-up of the CAP. Based on the audit results, overtime was recorded at one supplier in Bangladesh, but not excessive.

Bel-Confect asks first the specific reasons for the overtime. Sometimes the internal planning of Bel-Confect can be adapted, and more realistic timelines can be set. If the overtime is a reoccurring issue, Bel-Confect will reconsider the relationship with the supplier.

One of the suppliers in Bangladesh was not willing to limit excessive overtime and Bel-Confect decided to stop production keeping in mind the responsible exit strategy. Bel-Confect mentioned that it is difficult to keep overtime on the agenda when it has low leverage. Bel-Confect did not yet take steps to conduct a root-cause analysis to identify how overtime can be prevented in the future.

Recommendation: Bel-Confect could dig deeper into the root causes of overtime by conducting a root-cause analysis to identify how overtime can be prevented, and provide support to factory management to manage overtime.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.8 Member company can demonstrate the link between its buying prices and wage levels in production locations.	Advanced	Understanding the labour component of buying prices is an essential first step for member companies towards ensuring the payment of minimum wages – and towards the implementation of living wages.	Interviews with production staff, documents related to member's pricing policy and system, buying contracts.	4	4	0

Comment: Bel-Confect is aware of minimum wages on a country level, production minutes per style and its prices. When there is arise in legal minimum wages, buying prices are adjusted and increased. Bel-Confect has long term relationships with clients and addressed this topic at some of its clients. Bel-Confect showed for one of its larger clients an email discussion that the prices will increase to reflect wage increases for workers in the production locations. For one Tunisian supplier, Bel-Confect has insight into the labour costs per style, for other countries this knowledge is less developed yet. Bel-Confect could not yet explicitly show the link between their buying prices and the wages at the supplier.

Recommendation: Fair Wear encourages Bel-Confect to connect its buying prices to the labour minute costs at its Tunisian supplier and determine how much is needed to finance wage increase. And extend the lessons learned related to the open costing model to other suppliers.

Bel-Confect could start using the open costing towards its customers including factors that influence the price, i.e. price of materials, wages, transport costs and the exchange rate to show its clients how the price they pay relates to wages paid in the factories.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.9 Member company actively responds if production locations fail to pay legal minimum wages and/or fail to provide wage data to verify minimum wage is paid.	No problems reported/no audits	If a supplier fails to pay minimum wage or minimum wage payments cannot be verified, FWF member companies are expected to hold management of the supplier accountable for respecting local labour law. Payment below minimum wage must be remediated urgently.	Complaint reports, CAPs, additional emails, FWF Audit Reports or additional monitoring visits by a FWF auditor, or other documents that show minimum wage issue is reported/resolved.	N/A	0	-2

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.10 Evidence of late payments to suppliers by member company.	No	Late payments to suppliers can have a negative impact on production locations and their ability to pay workers on time. Most garment workers have minimal savings, and even a brief delay in payments can cause serious problems.	Based on a complaint or audit report; review of production location and member company financial documents.	0	0	-1

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.11 Degree to which member company assesses and responds to root causes for wages that are lower than living wages in production locations.	Intermediate	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach	Evidence of how payment below living wage was addressed, such as: Internal policy and strategy documents, reports, correspondence with factories, etc	4	6	0

Comment: Based on the wage ladders and audit results, Bel-Confect has analyzed wages and discovered that for most suppliers workers received more than minimum wage but not yet living wages. Bel-Confect has used Fair Wear's open costing tool to get insight into the labour minute costs at one production location in Tunisia. The next step is to work together with the production location towards the next target wage. Bel-Confect has identified its Tunisian production locations, with high leverage and possibly also the production location in Albania as possible suppliers to extend the open costing model and identify and work towards wage increase.

Recommendation: FWF encourages Bel-Confect to involve worker representatives and local organisations in assessing the root causes of wages lower than living wages.

It is advised that the outcomes of the root cause analysis are discussed internally and with top management, to form a basis for an embedded strategy.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.12 Percentage of production volume from factories owned by the member company (bonus indicator).	None	Owning a supplier increases the accountability and reduces the risk of unexpected CoLP violations. Given these advantages, this is a bonus indicator. Extra points are possible, but the indicator will not negatively affect an member company's score.	Supplier information provided by member company.	N/A	2	0

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.13 Member company determines and finances wage increases	None	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, correspondence with factories, etc.	0	4	0

Comment: Bel-Confect has determined how much the wages should be increased to work towards the next target wage for one factory. Bel-Confect has not created a plan yet to finance a wage increase.

Requirement: Bel-Confect should analyse what is needed to increase wages and develop a strategy to finance the costs of wage increases.

Recommendation: In determining what is needed and how wages should be increased, it is recommended to involve worker representation.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
1.14 Percentage of production volume where the member company pays its share of the target wage	0%	FWF member companies are challenged to adopt approaches that absorb the extra costs of increasing wages.	Member company's own documentation, evidence of target wage implementation, such as wage reports, factory documentation, communication with factories, etc.	0	3	0

Requirement: Bel-Confect is expected to begin setting a target wage for its production locations.

PURCHASING PRACTICES

Possible Points: 47

Earned Points: 31

2. MONITORING AND REMEDIATION

BASIC MEASUREMENTS	RESULT	COMMENTS
% of own production under standard monitoring (excluding low-risk countries)	83%	
% of production volume where monitoring requirements for low-risk countries are fulfilled	0%	To be counted towards the monitoring threshold. FWF low-risk policy should be implemented. See indicator 2.9. (N/A = no production in low risk countries.)
Meets monitoring requirements for tail-end production locations.	No	FWF members must meet tail-end monitoring requirements. Implementation will be assessed during next Brand Performance check.
Requirement(s) for next performance check	In the tail end of Bel-Confect's supplier base, FWF requires Bel-Confect to ensure it audits all production locations that: <ul style="list-style-type: none"> • Produce more than 2% of the member's volume • Where the member has more than 10% leverage • Where a high risk policy applies • Where a complaint is submitted. 	
Total of own production under monitoring	83%	Measured as percentage of production volume (Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100%)

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.1 Specific staff person is designated to follow up on problems identified by monitoring system	Yes	Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	2	2	-2

Comment: The CEO and the CSR advisor are designated to follow up. A new CSR manager has started just one month before the Brand Performance Check.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.2 Quality of own auditing system meets FWF standards.	Member makes use of FWF audits and/or external audits only	In case FWF teams cannot be used, the member companies' own auditing system must ensure sufficient quality in order for FWF to approve the auditing system.	Information on audit methodology.	N/A	0	-1

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.3 Audit Report and Corrective Action Plan (CAP) findings are shared with factory and worker representation where applicable. Improvement timelines are established in a timely manner.	Yes	2 part indicator: FWF audit reports were shared and discussed with suppliers within two months of audit receipt AND a reasonable time frame was specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.	2	2	-1

Comment: Bel-Confect has a process in place for sharing audits and corrective action plans with its production locations. Upon receiving the audit and CAP, Bel-Confect identifies priorities and timelines with its suppliers. Bel-Confect shares the audit and CAP by email/skype and plans a visit with the production manager to discuss how the follow up is going so far. Audit and CAP are shared with worker representative where applicable.

In Tunisia, the production manager visits the suppliers multiple times in the year and plays an active role in the follow-up of the CAP and has contact with the worker representatives about CAP follow up. When an audit and CAP are sent to an agent to forward it to a supplier, Bel-Confect gives additional explanation to the agent through telephone / email.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.4 Degree of progress towards resolution of existing Corrective Action Plans and remediation of identified problems.	Advanced	FWF considers efforts to resolve CAPs to be one of the most important things that member companies can do towards improving working conditions.	CAP-related documentation including status of findings, documentation of remediation and follow up actions taken by member. Reports of quality assessments. Evidence of understanding relevant issues.	8	8	-2

Comment: Bel-Confect initiated two audits the previous financial year and continued CAP follow up on earlier audits. Bel-Confect could show active CAP follow-up for these audits. The two audits that were carried out this year are located in Tunisia and Bangladesh.

The social audit in Tunisia resulted in active CAP follow up. Bel-Confect financially supported the remediation of non-compliance in the area of health and safety, worker representative was involved in the process. The audit in Bangladesh was at a shared supplier with another Fair Wear member, that takes the lead in the CAP follow up. Bel-Confect could show email correspondence about the CAP status.

For Bel-Confect the living wage topic is still a challenging topic to remediate. First steps are made with its supplier in Tunisia and Bel-Confect started the dialogue with its suppliers about possibilities to increase wages.

Bel-Confect has communicated to suppliers that they expect improvement which will result in growth and that repeatedly non-compliance may lead to ending the business relationship.

Recommendation: Bel-Confect could integrate the status of the remediated non-compliances in the CAP document, with a link to emails.

Bel-Confect could consider organizing a joint training for their suppliers in Tunisia on social dialogue and living wages, to ensure more commitment from the suppliers to remediate these more structural issues and facilitate peer to peer learning.

FWF also recommends Bel-Confect to gradually ensure factories establish independent worker representation and involve these representatives in monitoring and remediation of findings.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.5 Percentage of production volume from production locations that have been visited by the member company in the previous financial year.	79%	Formal audits should be augmented by annual visits by member company staff or local representatives. They reinforce to production location managers that member companies are serious about implementing the Code of Labour Practices.	Member companies should document all production location visits with at least the date and name of the visitor.	4	4	0

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.6 Existing audit reports from other sources are collected.	Yes, quality assessed and corrective actions implemented	Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.	Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.	3	3	0

Comment: Bel-Confect could show existing audit reports, the use of Audit Quality Assessment Tool and follow-up on corrective action plans.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.7 Compliance with FWF risk policies.	Average score depending on the number of applicable policies and results	Aside from regular monitoring and remediation requirements under FWF membership, countries, specific areas within countries or specific product groups may pose specific risks that require additional steps to address and remediate those risks. FWF requires member companies to be aware of those risks and implement policy requirements as prescribed by FWF.	Policy documents, inspection reports, evidence of cooperation with other customers sourcing at the same factories, reports of meetings with suppliers, reports of additional activities and/or attendance lists as mentioned in policy documents.	4	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Intermediate			3	6	-2
Compliance with FWF Myanmar policy	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on abrasive blasting	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees	Advanced			6	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Intermediate			3	6	-2

Comment: Bel-Confect has signed the Bangladesh Accord and discussed fire and building safety with its suppliers. As some of their suppliers were unwilling to be audited as part of the Accord requirements, Bel-Confect stopped sourcing and moved production to another supplier. Bel-Confect discusses the risk of harassment on the workplace with their Bangladesh suppliers and with members of the working committees. Bel-Confect provided their Turkish suppliers with information about Syrian refugees and established a letter to be signed related to employing Syrian refugees, Bel-Confect received confirmation that this was not an issue in these factories.

Recommendation: For Bangladesh in particular:

Bel-Confect is recommended to keep focussing on shared responsibilities with their production locations as business partners to improve workers' safety at the workplace. In terms of fire and building safety, the member could offer financial or technical support, or offer flexible lead time so that factories could prioritize remediation.

In terms of ensuring women's safety at work, Bel-Confect should make sure that suppliers have sufficient knowledge and a functional system to promote gender equality and prevent gender-based violence. A functional system to prevent violence needs involvement of both factory management and workers representatives. FWF local team has extensive experience on supporting both employees and employers in setting up anti-harassment systems. FWF local team could provide training and regular support to suppliers upon request.

In general, FWF encourages Bel-Confect to keep monitoring the labour risks in its supply chain closely by digging deeper in the country-specific risks, especially with a focus on the high-risk countries like China, Bangladesh and Pakistan.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.8 Member company cooperates with other FWF member companies in resolving corrective actions at shared suppliers.	Active cooperation	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the chances of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	2	2	-1

Comment: Bel-Confect cooperates with several Fair Wear member brands at shared suppliers.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled.	0-49%	Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws. FWF has defined minimum monitoring requirements for production locations in low-risk countries.	Documentation of visits, notification of suppliers of FWF membership; posting of worker information sheets, completed questionnaires.	1	3	0

Comment: The production location in Hungary was not visited.

Requirement: Monitoring requirements need to be fulfilled for production in low-risk countries in order for it to be counted towards the monitoring threshold. All production sites in low-risk countries must:

- Ensure up to date information on the labour conditions in the location either by a regular visit and/or a report by a third party;
- Be informed of FWF membership and return the completed CoLP questionnaire before production orders are placed;
- Be aware of specific risks identified by FWF;
- Have the FWF Worker Information Sheet posted in local languages.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.10 Extra bonus indicator: in case FWF member company conducts full audits at tail-end production locations (when the minimum required monitoring threshold is met).	No	FWF encourages its members to monitor 100% of its production locations and rewards those members who conduct full audits above the minimum required monitoring threshold.	Production location information as provided to FWF and recent Audit Reports.	N/A	2	0

Recommendation: FWF encourages members to go beyond the minimum required monitoring threshold and rewards members who audit production locations in the tail end as well to mitigate potential social compliance risks.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.11 Questionnaire is sent and information is collected from external brands resold by the member company.	Yes, and member has collected necessary information	FWF believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of FWF or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	2	2	0

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.12 External brands resold by member companies that are members of another credible initiative (% of external sales volume).	3%	FWF believes members who resell products should be rewarded for choosing to sell external brands who also take their supply chain responsibilities seriously and are open about in which countries they produce goods.	External production data in FWF's information management system. Documentation of sales volumes of products made by FWF or FLA members.	1	3	0

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
2.13 Questionnaire is sent and information is collected from licensees.	No licensees	FWF believes it is important for member companies to know if the licensee is committed to the implementation of the same labour standards and has a monitoring system in place.	Questionnaires are on file. Contracts with licensees.	N/A	1	0

MONITORING AND REMEDIATION

Possible Points: 35

Earned Points: 29

3. COMPLAINTS HANDLING

BASIC MEASUREMENTS	RESULT	COMMENTS
Number of worker complaints received since last check	0	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved	0	
Number of worker complaints resolved since last check	0	

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.1 A specific employee has been designated to address worker complaints	Yes	Followup is a serious part of FWF membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	1	1	-1

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.2 Member company has informed factory management and workers about the FWF CoLP and complaints hotline.	Yes	Informing both management and workers about the FWF Code of Labour Practices and complaints hotline is a first step in alerting workers to their rights. The Worker Information Sheet is a tool to do this and should be visibly posted at all production locations.	Photos by company staff, audit reports, checklists from production location visits, etc.	2	2	-2

Comment: Bel-Confect could show posted worker information sheets for a selection of suppliers.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.3 Degree to which member company has actively raised awareness of the FWF CoLP and complaints hotline.	3%	After informing workers and management of the FWF CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural worker-management dialogue.	Training reports, FWF's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	4	6	0

Comment: In the past financial year Bel-Confect has done one training at its Tunisian production location to increase workers' awareness.

Recommendation: FWF recommends members to actively raise awareness about the FWF Code of Labour Practices and FWF complaint hotline among a larger portion of its suppliers. The member should ensure good quality systematic training of workers and management on these topics. To this end members can either use FWF's Workplace Education Programme (WEP) basic module, or implement training related to the FWF CoLP and complaint hotline through service providers or brand staff. FWF guidance on good quality training is available on the Member Hub.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.4 All complaints received from production location workers are addressed in accordance with the FWF Complaints Procedure	No complaints received	Providing access to remedy when problems arise is a key element of responsible supply chain management. Member company involvement is often essential to resolving issues.	Documentation that member company has completed all required steps in the complaints handling process.	N/A	6	-2

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers	No complaints or cooperation not possible / necessary	Because most production locations supply several customers with products, involvement of other customers by the FWF member company can be critical in resolving a complaint at a supplier.	Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.	N/A	2	0

COMPLAINTS HANDLING

Possible Points: 9

Earned Points: 7

4. TRAINING AND CAPACITY BUILDING

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.1 All staff at member company are made aware of FWF membership.	Yes	Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of FWF membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	0

Comment: Twice a month there is an internal commercial meeting where Fair Wear membership is a standard agenda point, updates such as audit results or pictures of factory visits are shared.

In addition to this, there are informal meetings in which Fair Wear membership, as part of CSR, is discussed.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.2 All staff in direct contact with suppliers are informed of FWF requirements.	Yes	Sourcing, purchasing and CSR staff at a minimum should possess the knowledge necessary to implement FWF requirements and advocate for change within their organisations.	FWF Seminars or equivalent trainings provided; presentations, curricula, etc.	2	2	-1

Comment: The CSR Advisor keeps all staff in direct contact with suppliers and other staff members informed about Fair Wear requirements. The new CSR manager joined Fair Wear's living wage supplier seminar in Tunisia.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Yes	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of member company to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, FWF audit findings.	1	2	0

Comment: Bel-Confect has invested time in informing its agents to understand the relevance of the Fair Wear Code of Labour Practices. Some agents are more open to support the implementation of the CoLP than others. Bel-Confect is trying to move to more direct relationships with production locations and skip agents where possible.

Recommendation: FWF recommends Bel-Confect to actively train their sourcing contractors/agents on monitoring and remediating gender-related problems and enable them to support the implementation of the CoLP.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.4 Factory participation in training programmes that support transformative processes related to human rights.	0%	Complex human rights issues such as freedom of association or gender-based violence require more in-depth trainings that support factory-level transformative processes. FWF has developed several modules, however, other (member-led) programmes may also count.	Training reports, FWF's data on factories enrolled in training programmes. For alternative training activities: curriculum, training content, participation and outcomes.	0	6	0

Recommendation: FWF recommends members to implement training programmes that support factory-level transformation such as establishing functional internal grievance mechanisms, improving worker-management dialogue and communication skills or addressing gender-based violence. Training assessed under this indicator should go beyond raising awareness and focus on behavioural change and long-term structures to improve working conditions. To this end, members can make use of FWF's Workplace Education Programme communication or violence prevention module or implement advanced training through service providers or brand staff. FWF guidance on good quality training is available on the Member Hub.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
4.5 Degree to which member company follows up after a training programme.	No training programmes have been conducted or member produces solely in low-risk countries	After factory-level training programmes, complementary activities such as remediation and changes on brand level will achieve a lasting impact.	Documentation of discussions with factory management and worker representatives, minutes of regular worker-management dialogue meetings or anti-harassment committees.	N/A	2	0

TRAINING AND CAPACITY BUILDING

Possible Points: 11

Earned Points: 4

5. INFORMATION MANAGEMENT

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
5.1 Level of effort to identify all production locations	Intermediate	Any improvements to supply chains require member companies to first know all of their production locations.	Supplier information provided by member company. Financial records of previous financial year. Documented efforts by member company to update supplier information from its monitoring activities.	3	6	-2

Comment: Bel-Confect has put effort to identify all production locations including subcontractor locations. Bel-Confect visits its suppliers on a regular basis and explicitly asks about the use of subcontractors. Bel-Confect could show that this system has orders booked on the level of the subcontractors. The terms of using subcontractor locations are not included in written agreements with its direct suppliers.

Recommendation: FWF recommends Bel-Confect to periodically check with its agents whether all known production locations are still up to date. Furthermore, Fair Wear encourages Bel-Confect to establish written agreements with its main production locations on the use of subcontractors stating clearly that when subcontractors are used, they are included in the monitoring system.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
5.2 CSR and other relevant staff actively share information with each other about working conditions at production locations.	Yes	CSR, purchasing and other staff who interact with suppliers need to be able to share information in order to establish a coherent and effective strategy for improvements.	Internal information system; status CAPs, reports of meetings of purchasing/CSR; systematic way of storing information.	1	1	-1

Comment: The production manager, who regularly visits the production locations, exchanges the information with the CEO and CSR advisor. The new CSR manager will also be involved in production activities, it is planned that she visits the production locations on a regular basis to combine CoLP implementation with production activities.

INFORMATION MANAGEMENT

Possible Points: 7

Earned Points: 4

6. TRANSPARENCY

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.1 Degree of member company compliance with FWF Communications Policy.	Minimum communications requirements are met AND no significant problems found	FWF's communications policy exists to ensure transparency for consumers and stakeholders, and to ensure that member communications about FWF are accurate. Members will be held accountable for their own communications as well as the communications behaviour of 3rd-party retailers, resellers and customers.	FWF membership is communicated on member's website; other communications in line with FWF communications policy.	2	2	-3

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.2 Member company engages in advanced reporting activities	Published Brand Performance Checks, audit reports, and/or other efforts lead to increased transparency.	Good reporting by members helps to ensure the transparency of FWF's work and shares best practices with the industry.	Member company publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.	1	2	0

Comment: Bel-Confect has published the social report and Brand Performance Check report on its website with information about Fair Wear.

Recommendation: FWF recommends Bel-Confect to publish its supplier information on its website. Good reporting by members helps to ensure the transparency of Bel-Confect and Fair Wear's work.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
6.3 Social Report is submitted to FWF and is published on member company's website	Complete and accurate report submitted to FWF AND published on member's website.	The social report is an important tool for members to transparently share their efforts with stakeholders. Member companies should not make any claims in their social report that do not correspond with FWF's communication policy.	Social report that is in line with FWF's communication policy.	2	2	-1

TRANSPARENCY

Possible Points: 6

Earned Points: 5

7. EVALUATION

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
7.1 Systemic annual evaluation of FWF membership is conducted with involvement of top management	Yes	An annual evaluation involving top management ensures that FWF policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.	2	2	0

Comment: The CEO is directly involved in the implementation of Fair Wear Membership.

PERFORMANCE INDICATORS	RESULT	RELEVANCE OF INDICATOR	DOCUMENTATION	SCORE	MAX	MIN
7.2 Level of action/progress made on required changes from previous Brand Performance Check implemented by member company.	70%	In each Brand Performance Check report, FWF may include requirements for changes to management practices. Progress on achieving these requirements is an important part of FWF membership and its process approach.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	4	4	-2

Comment: Bel-Confect made progress on 4 out of the 5 requirements that were formulated last year.

EVALUATION

Possible Points: 6

Earned Points: 6

RECOMMENDATIONS TO FWF

SCORING OVERVIEW

CATEGORY	EARNED	POSSIBLE
Purchasing Practices	31	47
Monitoring and Remediation	29	35
Complaints Handling	7	9
Training and Capacity Building	4	11
Information Management	4	7
Transparency	5	6
Evaluation	6	6
Totals:	86	121

BENCHMARKING SCORE (EARNED POINTS DIVIDED BY POSSIBLE POINTS)

71

PERFORMANCE BENCHMARKING CATEGORY

Good | 71

BRAND PERFORMANCE CHECK DETAILS

Date of Brand Performance Check:

31-10-2019

Conducted by:

Rosan van Wolveren

Interviews with:

Filip Lietear - CEO

Saartje Boutsen - CSR advisor

Josefien Coffez - Production and CSR manager